

HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

CONTINENTAL CASUALTY COMPANY

Plaintiff,

v.

ROSALINDA HERRERA HEREDIA,
individually and as parent and guardian of
A.R.H., a minor; JUAN REYES TAPIA;
LESLIE REYES-HERRERA; ANA HERRERA
HEREDIA, individually and as parent and
guardian of E.H., a minor; EDUARDO
HERNANDEZ HERRERA; SAMPSON
KWAKU GYAN and GEORGINA
TWUMWAA GYAN, both individually and as
parents and guardians of M.G., a minor;
AMANDA POMAA GYAN; FRANCIS
KWADWO GYAN; ANGELINA ADOMA
GYAN; MEUY CHANG SAETURN and
BUON DUANGPRASAERT, both individually
and as parents and guardians of A.D., a minor;
GIFTY EGHAN; JOYCE MENSAH,
individually and as parent and guardian of E.D.,
a minor, JUSTIN ALEXANDER (as assignees
of VIP International Real Estate Group, Inc.);
and VIP International Real Estate Group, Inc., a
Washington corporation,

Defendants.

Case No. 2:24-cv-00917

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND
DEADLINES RE VIP
INTERNATIONAL REAL ESTATE
GROUP, INC.'S MOTION TO
DISMISS (DKT. 29)**

NOTE ON MOTION CALENDAR:
December 20, 2024

STIPULATED MOTION AND ~~PROPOSED~~ ORDER
TO EXTEND DEADLINES RE VIP
INTERNATIONAL REAL ESTATE GROUP, INC.'S
MOTION TO DISMISS (DKT. 29)- 1

Case No. 2:24-cv-00917
10968767.1 - 357567 - 0014

Inslee Best
10900 NE 4th Street
Bellevue, WA 98004
(425) 455-1234

1 Plaintiff Continental Casualty Company (“Continental”), and Defendant VIP International
2 Real Estate Group, Inc. (“VIP”), (collectively, the “Parties”), stipulate and agree as follows and
3 request that the Court enter an order consistent with the following:

4 1. On November 18, 2024, VIP filed a motion to dismiss (“Motion”) noted for December 20,
5 2024. This action was brought by Continental to establish its rights and obligations, or lack thereof,
6 relative to a contract for insurance issued to Defendant VIP.

7 2. On December 9, 2024, the Court entered a stipulated order adjusting the briefing schedule
8 related to the Motion such that Continental’s Response would be due on December 13, 2024, and
9 VIP’s Reply would be due on December 20, 2024.

10 3. Due to the illness of one of the attorneys participating in drafting VIP’s Reply and in light
11 of the holidays and plans of Continental’s lead counsel to be out of the office from December 26
12 through and including January 1, the parties stipulate and agree good cause exists to extend the
13 noting date for the Motion to December 23, set the date for the Reply to be filed as December 23,
14 and grant Continental until January 6, 2025, to file any surreply consistent with LCR 7(g).

Dated this 20th day of December, 2024

DLA PIPER LLP (US)

INSLEE BEST DOEZIE & RYDER

s/ Austin Rainwater

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s/ Mark S. Leen

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*Attorneys for Plaintiff Continental Casualty
Company*

*Attorneys for Defendant VIP International
Real Estate Group, Inc.*

ORDER

IT IS SO ORDERED.

Dated this 20th day of December, 2024.



HONORABLE JOHN C. COUGHENOUR
United States District Judge

PRESENTED BY:

DLA PIPER LLP (US)

INSLEE BEST DOEZIE & RYDER

s/ Austin Rainwater

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*Attorneys for Plaintiff Continental Casualty
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s/ Mark S. Leen

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*Attorneys for Defendant VIP International
Real Estate Group, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney of record for the parties.

Dated this 20th day of December, 2024.

s/ Mark S. Leen

Mark S. Leen, WSBA No. 35934

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